



September 20, 2011

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Stephanie A. Joyce

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Re: CC Docket No. 96-128, Alternative Rulemaking Proposal of Martha Wright, et al.

Dear Ms. Dortch:

Securus Technologies, Inc. ("Securus") files this letter to inform the Commission that it will provide updated cost information in this proceeding.

On August 15, 2008, seven providers of inmate telecommunications services, including Securus, submitted a study performed by economist Don Wood after having analyzed those providers' cost information. CC Docket No. 96-128, Inmate Calling Services Interstate Call Cost Study, Wood & Wood (Aug. 15, 2008) ("Wood Study"). The providers each submitted their cost data to Mr. Wood separately under seal, and did not share that data with each other.

The study employed the "marginal cost location" methodology that the Commission has used in this docket when reviewing the costs associated with providing public payphones. Wood Study at 4 n.9. That is, the study included only the costs associated with payphone service provided in correctional facilities where no site commissions are imposed. Without consideration of the cost of site commissions that are secured either by public contract or state statute, the Wood Study concluded that, collectively and on average, the providers experienced the following costs of providing interstate toll calls:

Debit Calls

Fixed Per-Call Cost	\$1.56
Time-Sensitive Transmission Costs	\$0.06

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Collect Calls

Fixed Per-Call Cost	\$2.49
Time-Sensitive Transmission Costs	\$0.07

Wood Study at 4.

The Commission has expressed interest in obtaining updated cost information from Securus. To that end, Securus is reviewing its overall cost of service. Securus will provide the Commission with information as to how its costs today differ from its costs at the time of the Wood Study, expressed as a percentage figure. Securus estimates that it can provide this updated information in approximately three weeks.

Please do not hesitate to contact me with any additional questions or concerns: 202.857.6081. Thank you for your consideration.

Sincerely,

s/Stephanie A. Joyce

Counsel for Securus Technologies, Inc.

cc: Chairman Julius Genachowski (*via electronic mail*)
Commissioner Michael Copps (*via electronic mail*)
Commissioner Robert McDowell (*via electronic mail*)
Commissioner Mignon Clyburn (*via electronic mail*)
Sharon Gillett, Chief, Wireline Competition Bureau (*via electronic mail*)
Austin Schlick, General Counsel (*via electronic mail*)
Zachary Katz, Legal Advisor to Chairman Genachowski (*via electronic mail*)
Margaret McCarthy, Policy Advisor to Commissioner Copps (*via electronic mail*)
Christine Kurth, Legal Advisor to Commissioner McDowell (*via electronic mail*)
Angela Kronenberg, Legal Advisor to Commissioner Clyburn (*via electronic mail*)
Albert Lewis, Chief, Pricing Policy Division, Wireline Competition Bureau (*via electronic mail*)
Marcus Maher, Legal Advisor to Chief of the Wireline Competition Bureau (*via electronic mail*)
Pamela Arluk, Assistant Chief, Pricing Policy Division, Wireline Competition Bureau (*via electronic mail*)
Lynne Hewitt Engledow, Pricing Policy Division, Wireline Competition Bureau (*via electronic mail*)

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Michelle Berlove, Pricing Policy Division, Wireline Competition Bureau (*via electronic mail*)

Jennifer Prime, Acting Legal Advisor, Office of the Bureau Chief, Wireline Competition Bureau (*via electronic mail*)